

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

JOSEPH MANTHA on behalf of himself :  
and others similarly situated, :

Plaintiff, :

v. :

QUOTEWIZARD.COM, LLC :

Defendant. :

Case No. 1:19-cv-12235-LTS-PK

**DECLARATION OF JOHN W. BARRETT IN SUPPORT OF  
MOTION FOR CLASS CERTIFICATION**

1. I am an attorney duly admitted to practice in the Commonwealth of Massachusetts and this District. I am over 18 years of age, I am competent to testify and make this affidavit on personal knowledge. I make this declaration in support of Plaintiff's Motion for Class Certification. In this declaration I will describe the work that I and my co-counsel have done in identifying and investigating potential claims in the action and to set forth my qualifications to serve as class counsel, and describe my experience in representing plaintiff classes in class actions, and cases brought under the 47 U.S.C. § 227, the Telephone Consumer Protection Act. ("TCPA").

2. I have litigated numerous TCPA class actions with my co-counsel in this action. Since joining Plaintiff's team in this case, I have been involved in all strategy decisions, reviewing documents and analyzing expert reports for both Plaintiff and Defendant.

3. I have extensive class action experience. I have handled and won class action, mass action, and individual plaintiff jury trials in federal and state court, and successfully argued appeals to uphold verdicts won in those cases.

4. Based on my experience in TCPA class actions, I believe the proposed settlement in

this case represents an excellent result for the proposed class and merits preliminary and final approval by the Court.

5. A sampling of my firm's experience in class actions includes:

- *Krakauer v. Dish Network, L.L.C.*, No. 1:14-cv-00333, M.D. N.C. (five-day TCPA jury trial and a treble damages award for a certified class, resulting in \$61.3 million judgment, *affirmed* 925 F.3d 643 (4<sup>th</sup> Cir. 2019));
- *Vance v. DirecTV*, No. 5:17-179, N. D. W. Va. (\$16.875 million nationwide TCPA settlement);
- *Hankins v. Alarm.com Incorporated and Alarm.com Holdings, Inc.*, No. 4:15-cv-06314, N.D. Cal. (settled TCPA class action for \$28 million);
- *In re Monitronics TCPA Litig.*, MDL No. 2493, N.D. W.Va. (appointed MDL Co-Lead Counsel; \$28 million TCPA class action settlement);
- *Mey v. Patriot Payment Group, LLC*, No. 5:15-cv-00027, N.D. W.Va. (\$3.7 million settlement in TCPA class action);
- *Mey v. Venture Data, LLC*, No. 5:14-cv-00123, N.D. W. Va. (\$2.1 million TCPA class action settlement);
- *Mey v. Frontier Communications Corp.*, No. 3:13-01191, D. Conn. (\$11 million nationwide TCPA settlement);
- *Generic Drug Litigation (State of West Va. v. Rite Aid of West Va.*, No. 09-C-27; and *State of West Va. v. CVS Pharmacy, Inc.*, No. 09-C-226 (Circuit Court of Boone County, West Virginia) (as Special Assistant Attorney General, won settlements of more than \$10 million in *parens patriae* consumer protection litigation);
- *Carter v. Forjas Taurus SA et al.*, No. 1:13-CV-24583, S.D. Fla. (class counsel for product liability class action against Brazilian pistol manufacturer; settlement provides for the free exchange of defective pistols for new pistols (unlimited by any claims period), or cash payments of up to \$30 million for returned pistols; total value of settlement \$240 million);
- *Desai v. ADT Security*, No. 11-C-1925, N.D. Ill. (\$15 million TCPA settlement for nationwide class).

PURSUANT TO 28 U.S.C. § 1746, I DECLARE SIGNED UNDER PENALTY OF PERJURY OF THE UNITED STATES OF AMERICA THAT THE FOREGOING IS TRUE AND CORRECT EXECUTED THIS THIS 20th DAY OF MAY, 2025

/s/ John W. Barrett

John W. Barrett